

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

RAJAT DAWAR, individually and on behalf of all others similarly situated,	)	
	)	
	)	
Plaintiff,	)	Case No.
	)	1:24-cv-09106
v.	)	
	)	
SAM’S WEST, INC. and SAM’S EAST, INC.,	)	
	)	
Defendants.	)	

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**JOINT UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants Sam’s West, Inc. and Sam’s East, Inc. (collectively “Sam’s”), by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b) respectfully move for an order extending the time to answer or otherwise respond to Plaintiff’s Complaint (Dkt. 1) (“Complaint”). Specifically, Sam’s seeks a 31-day extension to answer or otherwise respond to the Complaint, to and including November 25, 2024. Counsel for Sam’s contacted counsel for Plaintiff, and Plaintiff consents to the requested extension.

In further support for the requested extension, Sam’s states:

1. On October 4, 2024, Plaintiff served both Sam’s defendants through their agent for service of process. Under Federal Rule of Civil Procedure 12(a)(1)(A), Sam’s current deadline to answer or otherwise respond to the Complaint is October 25, 2024.
2. Sam’s respectfully requests a 31-day extension of the deadline to answer or otherwise respond to the Complaint, to and including November 25, 2024.
3. Good cause exists for this requested extension. Counsel for Sam’s has been recently retained, and Sam’s seeks this extension to allow it sufficient time to investigate the allegations

asserted in the Complaint, prepare a response, and explore the potential for discussions with Plaintiff's counsel for a resolution of this matter.

4. This is Sam's first request for an extension in this case, and Sam's has not previously requested an extension of the deadline.

5. Moreover, this request for an extension of time is made in good faith and not for the purpose of delay, and an extension will not prejudice any party or affect any other deadlines in this matter.

6. Counsel for Sam's consulted with Plaintiff's counsel, and Plaintiff joins and consents to the requested extension of time.

Therefore, Sam's respectfully requests that the Court enter an order extending the time to respond to Plaintiff's Complaint to and including November 25, 2024.

[Signatures on Following Page]

Dated: October 24, 2024

Respectfully submitted,

/s/ Neal J. Deckant (with express permission)

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*Counsel for Defendants Sam's West, Inc.  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was filed on October 24, 2024, with the Court and served electronically through the CM/ECF system to all counsel of record registered to receive a Notice of Electronic Filing for this case.

/s/ Terance A. Gonsalves

Terance A. Gonsalves

*Counsel for Defendants Sam's West, Inc. and  
Sam's East, Inc.*